

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

This document relates to: Judge Dan Aaron  
Polster

The County of Cuyahoga v. Purdue  
Pharma L.P., et al.  
Case No. 18-OP-45090

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Videotaped deposition of
CYNTHIA G. WEISKITTEL

November 13, 2018
8:59 a.m.

Taken at:
Climaco, Wilcox, Peca & Garofoli
55 Public Square, Suite 1950
Cleveland, Ohio

Renee L. Pellegrino, RPR, CLR

CUYAH_002452933, was marked for purposes of identification.)

Q. Two copies of Exhibit 3, which is a single page, Bates number CUYAH_002452933, and it involves an e-mail chain from April 21st, 2014.

Do you see that?

A. Yes.

Q. And do you see your name on this e-mail chain at the top when Chris Cabot forwarded the chain to you?

A. Yes.

Q. And it has some of the names we've talked about already.

Trista Piccola is in the middle of this, right?

A. Yes.

Q. It seems to have deleted or elided the e-mail -- the full e-mails between them. It says a prior one was from Deanna Shuster. Do you know who that was?

A. Yes.

Q. What was her role?

A. Deanna Shuster is a supervisor.

options for prescription opiate pills (Percocet, Vicodin, etc.) or just opiate dependence in general. Can this be added?" I only see heroin, oxymorphone, methadone, hydromorphone, morphine and codeine as possible opiate choices."

Did I read that right?

A. Yes.

Q. "There also does not appear to be an option for alcohol either. Please advise as I know this data will be very valuable in the coming weeks."

This ultimately gets forwarded up to you?

A. Um-hum.

Q. And Mr. Cabot's comment is, or his e-mail says, "Have I told you lately thanks for being you? If not for you, I'm not sure how much longer I could last."

Do you know what he's talking about there?

A. No, I don't.

Q. Do you know what the interaction is here between him and Trista Piccola where she asks, "Why are you sending this to me?" And he

Q. Is she currently under you?

A. She's currently a supe under me. I do not know in 2014 if she was still a worker in START or if she had been promoted to supervision. I don't know.

Q. From the name at the bottom or the box at the bottom --

A. She's a worker, yes.

Q. It says, "Social service worker 3"?

A. Yes.

Q. So were you her indirect supervisor back then?

A. Deanna would have worked for Chris Cabot and Chris Cabot worked for me.

Q. So if we can track this, the first e-mail is Deanna Shuster basically following up on what we're doing, talking about entering data into SACWIS relating to drug of choice, correct?

A. Yes.

Q. So, in context, this is shortly after the prior memo that we went over, right?

A. Yes.

Q. And Ms. Shuster says, "I was completing the drug of choice entries in SACWIS for clients and noticed that there are no

responds, I thought you originally sent out the directions on entering drug of choice?"

MR. CIACCIO: Objection to form.

Q. Do you know what that's about?

A. Not other than what it says.

Q. I mean, did they have a history of kind of being conflictual, the two of them?

A. No, not as far as I know.

Q. Going back to, like, the substance of Ms. Shuster's e-mail, would it have been a problem if you couldn't specifically differentiate between prescription opioids, like Percocet and Vicodin listed here, versus the various street drugs, like heroin that are listed as opiate choices?

MR. CIACCIO: Objection to form.

A. Deanna was a member of the START unit and very specific. For us it was a question of opiates, whether they were opioids or opiates. So she's asking for the specific drugs to be listed.

Q. And why would that matter more for START than for the general department?

A. In START, their work with the drug clients, they drill much further down into the

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Whereupon, counsel was requested to give instruction regarding the witness' review of the transcript pursuant to the Civil Rules.

SIGNATURE:

Transcript review was requested pursuant to the applicable Rules of Civil Procedure.

TRANSCRIPT DELIVERY:

Counsel was requested to give instruction regarding delivery date of transcript.

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I do further certify that I am not a relative, counsel or attorney for either party, or otherwise interested in the event of this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Cleveland, Ohio, on this 16th day of November, 2018.

<%2227,Signature%>

Renee L. Pellegrino, Notary Public
within and for the State of Ohio

My commission expires October 12, 2020.

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REPORTER'S CERTIFICATE

The State of Ohio,)

) SS:

County of Cuyahoga.)

I, Renee L. Pellegrino, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, CYNTHIA G. WEISKITTEL, was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

Veritext Legal Solutions
1100 Superior Ave
Suite 1820
Cleveland, Ohio 44114
Phone: 216-523-1313

November 16, 2018

To: Napoli Shkolnik PLLC

Case Name: In Re: National Prescription Opiate Litigation v.

Veritext Reference Number: 3112776

Witness: Cynthia G. Weiskittel Deposition Date: 11/13/2018

Dear Sir/Madam:

The deposition transcript taken in the above-referenced matter, with the reading and signing having not been expressly waived, has been completed and is available for review and signature. Please call our office to make arrangements for a convenient location to accomplish this or if you prefer a certified transcript can be purchased.

If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived.

Sincerely,
Production Department
NO NOTARY REQUIRED IN CA

109 (Pages 430 to 433)

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